

**HELEN F. DALTON & ASSOCIATES, P.C.**  
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November 6, 2023

**Via ECF:**

The Honorable Gabriel W. Gorenstein, U.S.M.J.  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**MEMORANDUM ENDORSED**

Re: **Puerto et al v. Happy Life Home Health Agency Inc. et. al.**  
Civil Docket No.: 1:23-cv-04915-GWG

Dear Judge Gorenstein:

Our office represents the Plaintiff in the above-referenced matter and we respectfully submit this letter motion, jointly with the Defendants to request a brief extension of the time to file the parties' settlement agreement and *Cheeks* motion. As an initial matter, we apologize for not filing this request sooner.

The parties are still in the process of finalizing the settlement documents and we respectfully request a one-week extension or until November 13, 2023 to comply with the Court's Order and file the above-referenced documents.

This is the parties' first request for an extension of this deadline and this request will not affect any other dates or deadlines.

We thank The Court for its kind consideration on this matter, and we remain available to provide any additional information.


Respectfully submitted,

Extension to November 13, 2023, granted.

So Ordered.

  
GABRIEL W. GORENSTEIN  
United States Magistrate Judge

November 6, 2023

  
Roman Avshalumov, Esq.